

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

407 W. IMPERIAL HWY, SUITE H, PMB 230, BREA, CALIFORNIA 92821

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

July 7, 2004

GLENN PARKER
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PUBLIC MEMBER
ORANGE COUNTY

STEVE FELD
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Mr. James Hartl
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

County of Los Angeles General Plan Update

Dear Mr. Hartl:

The Wildlife Corridor Conservation Authority (WCCA) offers the following comments on Los Angeles County's proposed General Plan Update, entitled Shaping the Future 2025, and related documents, including the Draft Significant Ecological Areas Proposed Regulatory Changes (from the County Department of Regional Planning website). WCCA provided related comments in a December 20, 2002 letter on the Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan, and in April 30, 2001 and May 2, 2001 letters on the Los Angeles County Significant Ecological Areas (SEAs) Update Study (enclosed). Of those comments listed below, WCCA is most interested in assuring that the SEA Regulatory Review Procedures continue to provide adequate review opportunities for developments in SEAs and that they provide adequate protection for SEAs. Many of the following comments are based on comments provided by the Santa Monica Mountains Conservancy in a June 14, 2004 letter to the County. (Throughout this letter, underlined means to add, ~~strike-out~~ means to delete, and repeated periods means the text should remain unchanged.)

Significant Ecological Areas Proposed Regulatory Changes

The comments in this section refer to the draft document from the Los Angeles County Department of Regional Planning website, entitled Significant Ecological Areas Proposed Regulatory Changes (dated March 11, 2004), proposed as part of the General Plan Update. As stated in previous letters, WCCA commends the County and its consultants on the excellent work done for the update of the SEAs. Specifically WCCA compliments the County's efforts to propose more inclusive and biologically sound boundaries to ensure sustainability of the SEAs. This is evident in the proposed Puente Hills SEA.

However, WCCA is concerned that the proposed changes to the SEA Regulatory Review Procedures (Section II of the Significant Ecological Areas Proposed Regulatory Changes) will not provide the needed protections for either the existing or the new expanded SEAs. Notably, additional exemptions to the SEA review process have been added, and many activities would not be required to be reviewed by Significant Ecological Areas Technical Advisory Committee (SEATAC), nor would they require a public hearing. The proposed regulations would result in four categories of SEA review: (1) exemptions from SEA review process (no SEATAC review, no public hearing), (2) Director's Review (no SEATAC review, no public hearing), (3) Minor Conditional Use Permit (CUP) (no SEATAC review, sometimes a public hearing is required), and (4) CUP (with SEATAC review and public hearing).

WCCA concurs with the comments made by the Santa Monica Mountains Conservancy in a June 14, 2004 letter, that a community-level Biological Constraints Analysis must be required for all development projects requiring grading of more than 5,000 square feet (sq. ft.) within SEAs. This is more consistent with current requirements (as stated in County of Los Angeles Department of Regional Planning Biological Constraints Analysis Guidelines, p. 1, from the County website). This is a key step as part of a proactive approach to adequately protect SEAs. This should be required for all projects grading over 5,000 sq. ft. of surface area within SEAs, even those proposed to be exempt from SEA review (see below).

WCCA also concurs with the comments made by the Santa Monica Mountains Conservancy that additional types of projects in SEAs should undergo SEATAC review, and should be available for public comment, than those currently proposed in the SEA Regulatory Review Procedures. Alternately, the thresholds for exemptions and related categories should be made more rigorous, as described in more detail below.

SEA exemptions (no SEATAC review, no public hearing): Under the SEAs Proposed Regulatory Changes, some exemptions would include new individual single-family homes, grazing, vegetation removal less than one acre (provided that no more than one acre is removed within a single calendar year), and grading of slopes less than 8 percent (provided that no more than 2,500 cubic yards of earth is moved).

There are uncountable scenarios in which these proposed exempt activities could result in significant, adverse environmental impacts, either individually, or cumulatively, without adequate avoidance, mitigation, or public review. There are cases where a new single-family home may be proposed in a visually sensitive area (e.g., visible from scenic roads, trails, parkland, etc.), resulting in significant adverse project-related impacts, or resulting in significant, adverse cumulative impacts from several single-family homes being built in the area. Also, extensive grazing over a large area, can result in significant degradation to native plant communities and sensitive species. Vegetation removal of one acre per

year over several years, can also result in significant loss of native habitat and watershed protection. These types of activities can be particularly problematic if the development and vegetation removal occur in sensitive habitat areas near water sources used by wildlife (such as mammals), or near a habitat linkage chokepoint. The proposed new regulations would let such projects through like a super-coarse sieve.

These procedures also state that projects on parcels located partially within an SEA (provided the development area is outside of the SEA) are exempt. It appears this may allow fuel modification and other harmful indirect effects on the SEA without consideration of simple avoidance alternatives that would be obvious from a constraints report.

The SEAs Proposed Regulatory Changes document states that several of these activities are not subject to a building or grading permit, thus are not under the scrutiny of zoning review. WCCA recommends that the County require SEATAC review for these activities. However, if the County proceeds with considering these activities exempt, then at the very least, the following changes should be made to the SEA exemption procedure. As stated above, a biological constraints analysis should be prepared for all of these aforementioned activities resulting in grading of over 5,000 sq. ft. of surface area within SEAs. The proposed exemptions should be modified as follows:

- New single-family residences, that will result in less than 5,000 square feet of surface area grading....
- Projects on parcels partially within a SEA, provided the development area (including the fuel modification areas) is outside of the SEA, the applicant proposes and commits to implement measures to minimize indirect effects to the SEA, and the County biologist has approved these measures.
- Grazing of horses...provided that the grazing and corrals occupy less than ½ acre.
- Vegetation removal less than one ½ acre total, provided that no more than one acre is removed within a single calendar year (in all years combined on a single property)...
- Grading of land with a slope of less than 8 percent provided that no more than 2,500 1,000 cubic yards of earth is moved.

WCCA recommends that at the very least the County biologist review these projects to ensure compliance with the exemption requirements.

SEA Director's Review (no SEATAC review, no public hearing): According to the SEAs Proposed Regulatory Changes, a "Director's review" would consist of a site visit by the County biologist, review of a checklist, and the possibility for recommended changes by the biologist, and/or recommendation to the Minor CUP process (which also does not

require SEATAC review). These types of activities would have greater impacts than those proposed under the exemption category, and they have the potential for significant, adverse environmental impacts, individually and cumulatively. WCCA recommends that these activities listed in this paragraph be subject to SEATAC review and that the public be afforded the opportunity to comment. If the County elects to maintain these activities in this SEA Director's Review category (with no SEATAC review and no public hearing), at the very least, the following changes should be made:

- Grading of land with a slope of less than 8 percent and over ~~2,500~~ 1,000 cubic yards but less than ~~5,000~~ 2,500 cubic yards of earth of moved.
- Vegetation removal of ~~1.0 to 2.5~~ ½ to 1.0 acre...

Also, on the checklist for those projects in the SEA Director's Review category, all streams, not just United States Geological Survey (USGS) blue-line streams, should be considered.

Minor CUP (no SEATAC review, sometimes a public hearing is required): The Minor CUP process would require certain Development Standards Applicable to Small Subdivisions and a Burden of Proof to be met, with no SEATAC review required. WCCA concurs with the Santa Monica Mountains Conservancy and *strongly* recommends that all small subdivisions (4 units or less) within SEAs be required to be subject to SEATAC review, and that the public be afforded the opportunity to comment. The other activities proposed in this category should also be subject to SEATAC review, including relocation of two or more property lines between three or more contiguous parcels; grading under certain conditions, and vegetation removal under certain conditions. However, if the County proceeds with considering these activities under the proposed Minor CUP process, at the very least, the following changes should be made to the thresholds for this category, to the Development Standards Applicable to Small Subdivisions, and to the Burden of Proof.

If the County elects to maintain these activities in this category, the following changes should be made to the thresholds for this category:

- Grading of land with a slope of 8 percent or greater, but less than ~~25~~ 15 percent in an amount between ~~5,000~~ 2,500 cubic yards and ~~10,000~~ 5,000 cubic yards.
- Vegetation removal greater than ~~2.5~~ 1 acres but less than 20 percent of gross project area, or vegetation removal greater than 1 acre, but less than 2.5 acres....

Additional specificity is warranted for the phrases: "...maintain the remaining portions of the site in a natural undisturbed site..." (in 1.a. Development Standards Applicable to Small Subdivisions, p.8), and "...setting aside appropriate and sufficient undisturbed areas..." (in

2.a. Burden of Proof, p. 9). The following language should be added to these two sections:

This shall be accomplished by dedicating the land in fee simple to an appropriate public entity capable of managing open space for resource protection and recreational use, or by granting conservation easements, or recording a offer to dedicate conservation easements, to the County and to an appropriate public entity capable of managing open space for resource protection and recreational use, prior to vegetation removal or grading.

In 1.c. Development Standards Applicable to Small Subdivisions, the language appears to allow development of a majority of the floodplain or stream, as long as a small portion is not altered. This language should be clarified so as to emphasize avoidance of the majority of the floodplain or stream. From a financial investment standpoint, it seems illogical to build in the floodplain. Also, avoidance of streams is preferred to protect the biological functions and values of the stream. This language should be changed as follows:

Not alter, grade, fill or build within the ~~entire extent of the~~ hydrological floodplain or biological margins of a river corridor, a blue line stream, or other perennial or intermittent watercourse to reduce the need for bank stabilization, unless no other alternative is feasible, the floodplain and watercourse have been avoided to the maximum extent, and appropriate mitigation measures will be implemented.

The proposed 100 foot buffer around wetland areas is not sufficient (1.d. Development Standards Applicable to Small Subdivisions, p. 8) to protect functions and values of the wetland. A buffer of 200-300 feet is more appropriate given the sensitivity of wetlands and the typical buffer recommended by the California Department of Fish and Game.

CUP (with SEATAC review and public hearing): The SEA Regulatory Review Procedures for CUPs (including SEATAC review), should provide the highest level of protection because presumably these activities could potentially result in the greatest impacts to the SEAs. Key protections should be added to Section 2. Burden of Proof (p. 11). Additional specificity regarding land dedications and conservation easements should be added to the language in Section 2.a., "...setting aside appropriate and sufficient undisturbed areas..." The language regarding land dedications and conservation easements proposed above for the Burden of Proof for Minor CUPs should be added to the requirements for CUPs.

Specific development standards and conditions to lessen potential biotic impacts to the site in the CUP process for SEAs are not proposed in the SEAs Proposed Regulatory Changes because they are proposed to be developed through the SEATAC process (see p. 11 of the SEAs Proposed Regulatory Changes). These standards and conditions for the CUP process should be more protective than those proposed for the Minor CUP process. For example, the proposed protections relating to wildlife-permeable fencing (1.e., f. of

Development Standards Applicable to Small Subdivisions, p. 9) from the minor CUP process should be incorporated into the CUP process.

Also, several changes should be incorporated into the Burden of Proof for the CUP process in SEAs. A requirement should be added to the Burden of Proof for CUPs (Section 2.a., p. 11) so that access roads are designed to minimize disturbance and avoid and minimize impacts to sensitive resources. Also, "..., protect habitat linkages and protect movement corridors" should be added to end of Section 2.e., Burden of Proof for CUPs, regarding preserving habitat connectivity. In addition, buffers of 200-300 feet to wetlands and streams should be a requirement in Section 2.d. Burden of Proof for CUPs.

Specific comments on Puente Hills SEA: WCCA supports the specific considerations for the Puente Hills SEA (p. 15, Draft SEA Regulatory Framework). County staff will refer to those considerations when reviewing applications for minor CUPs and CUPs in SEAs.

In the Draft Significant Ecological Area Puente Hills document provided on the County's website, the following language should be added to the end of the section entitled Wildlife Movement (p. 4):

Two wildlife movement chokepoints exist within the corridor, at Harbor Boulevard and at the Tonner Canyon at State Route 57. If one of these chokepoints is compromised, the ecological viability of the remaining corridor may be compromised.

Also, these two chokepoints should be mentioned in the second bullet under Puente Hills SEA, in Section III. Specific Considerations for Individual SEAs (p. 15, Draft SEAs Regulatory Framework).

WCCA reiterates those comments in WCCA's previous letters regarding modifications to the SEA boundaries. Notably, areas 5 (southeast of Shea Homes) and 6 (oil field east of Harbor Boulevard) identified in WCCA's April 30, 2001 letter should be added to the Puente Hills SEA. These areas support coastal sage scrub, a very threatened plant community, and coastal California gnatcatcher, a bird species listed as threatened by the United States Fish and Wildlife Service.

Conservation/Open Space Element

It is critical to add the following policy to the Conservation/Open Space Element (e.g., after Policy O-6.3) to ensure adequate protection of SEAs, given the potential for significant adverse environmental impacts from developments in SEAs.

Proposed developments in SEAs shall include mitigation for unavoidable

impacts to SEAs from the removal, conversion, or modification of natural habitat for new development, including required fuel modification and brush clearance. Mitigation measures include permanent preservation of existing habitats, habitat restoration, and habitat enhancement. Mitigation areas shall be protected in perpetuity by fee simple dedications and/or conservation easements.

Similar to proposed policies O-10.8 and O-12.1, which address recreational opportunities and watershed protection, the following policy should be added after Policy O-5.4 to promote proactive conservation efforts to protect sensitive biological resources:

Pursue and encourage public and/or private funding for the purchase of parcels and/or conservation easements within SEAs to preserve significant ecological resources.

The County is not in the position of advocating development; rather the County responds to and regulates development proposals. Policy O-5.1 should be amended to read: "~~Advocate~~ Restrict development that ~~is highly compatible with~~ compromises biotic resources."

Policy O-5.3 addresses maintaining the integrity of the County's diverse plant communities. Other sensitive and declining plant communities, including coastal sage scrub and native grasslands, should be considered in this policy, in addition to those already listed. Coastal sage scrub is recognized as very threatened in southern California by the California Department of Fish and Game.¹ It has been estimated that about 70-90 percent of the presettlement coastal sage scrub in southern California has been destroyed mostly by residential development.² Coastal sage scrub also supports a suite of sensitive wildlife and plant species. With respect to native grassland, it has been estimated that there has been about 99 percent loss of native grassland in California.³

Policy O-6.3 for SEAs should be amended as follows: "Site roads and utilities to avoid sensitive critical habitat areas or migratory paths." If "critical" habitat is retained, this may appear to limit the analysis to only habitat designated by the United States Fish and Wildlife Service as "critical habitat," when other areas also provide significant habitat values.

¹ See sensitivity rankings, "Sensitivity of Top Priority Rare Natural Communities in Southern California," determined by the California Department of Fish and Game.

² As cited in Noss et al. 1995

³ Kreissman 1991, as cited in Noss et al. 1995

The following language should be added to Policy O-6.3 for SEAs, and this policy should also be added to the Circulation Element:

Site roads to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as roadkill) during continued operation of existing roadways and construction of new and expanded roadways.

The following policy should be added after Policy O-5.4: "Develop and maintain a detailed database of mitigation sites, conservation easements, and publicly-owned open space, etc." This effort would help provide accurate land use and zoning categories. Also, this information would help County planners when analyzing potential impacts of future developments on existing protected open space.

The General Plan should show where potential habitat linkages remain to connect large regional open space areas. These areas must receive special wildlife corridor designation in the General Plan.

WCCA supports Policy O-10.9 which states in part "[a]dvocate development of... equestrian, biking and hiking trails..." The following policy should be added after Policy O-10.9: "Where feasible and consistent with public safety and operational uses, encourage joint use for public access on infrastructure access roads, and under utility lines."

WCCA supports Policy O-8.1, which states:

Protect the visual quality of scenic hillsides, including but not limited to ridgelines, hillside slopes and natural vegetation, to preserve the integrity of existing terrain—particularly areas located at key vantage points from public roads, trails and recreation areas.

Land Use Element

WCCA supports the intent of Policy L-2.2 and Policy L-3.1. Notwithstanding, WCCA supports the recommendation by San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy to make the following wording changes in these policies:

Policy L-2.2: Promote designs that preserve ~~significant~~ plant and animal habitats, natural scenery—including hillsides and ridgelines—cultural sites, public parklands and open space.

Policy L-3.1: ~~Promote~~ Establish improved inter-jurisdictional coordination of land use and transportation policy matters between the county, cities,

adjacent counties, special districts, and regional and subregional agencies.

The following policy should be added to the Land Use Element after Policy L.2-11:

Require that it be demonstrated in development applications that developments are consistent with existing adopted plans including trails plans, parks plans, watershed plans, and river master plans.

Housing Element

Similar to the policy proposed for the Santa Monica Mountains (Policy H-5.8.A), the following policy should be added: "Puente-Chino Hills: Limit housing due to the widespread presence of natural hazards, valuable natural resources."

Circulation Element

WCCA supports Goal C-6, and associated policies. This goal is a scenic highway system that preserves and enhances natural resources within its corridors while serving the public through various transportation modes and access to recreational opportunities.

Goal C-1 should be amended to read:

A balanced, multi-modal transportation system, coordinated with established and projected land use patterns, to serve the mobility needs of residents and commerce ~~and~~ , improve air and water quality, and protect natural resources.

The following policy should be added to the Circulation Element, after Policy C-1.6:

Site roads and utilities to avoid significant adverse impacts to wildlife movement. Mitigate adverse impacts to wildlife (such as roadkill) during continued operation of existing roadways and construction of new and expanded roadways.

WCCA notes that two major highways are proposed through existing parkland within the Whittier-Puente-Chino Hills in the main document, Shaping the Future 2025. One appears to connect 7th Avenue to Turnbull Canyon Road in the Whittier Hills, and the other appears to connect Asuza Avenue with Harbor Boulevard. In the County's Staff Proposed Changes as of June 17, 2004 from the County's website, these two are proposed to be deleted. WCCA supports the exclusion of these two proposed roads

Safety Element

Policy S-3.2 should be expanded to emphasize avoidance of fuel modification practices

County of Los Angeles
General Plan Update
July 7, 2004
Page 10

within public parklands. The following underlined language should be added:

Promote fuel modification practices that balance safety with natural habitat protection and that help reduce the risk of damaging runoff and erosion. For new developments adjacent to parklands, site and design developments to allow required fire-preventative brush clearance to be located outside park boundaries, unless no alternative feasible building site exists on the project site and the project applicant agrees to pay for required fuel modification within the parkland. Maintain a natural vegetation buffer of sufficient size between the necessary fuel modification area and public parkland.

WCCA appreciates the opportunity to comment. Please direct any questions or future documents to Judi Tamasi of our staff at (310) 589-3200 ext. 121 and at the above address.

Sincerely,



Steve Feld
Chairperson

Literature cited

Kreissman, B. 1991. California, an environmental atlas and guide. Bear Claw Press, Davis, Calif.

Noss, R.F., E.T. LaRoe III, and J.M. Scott. 1995. Endangered Ecosystems of the United States: A Preliminary Assessment of Loss and Degradation. U.S. Department of the Interior, National Biological Service, Biological Report 28. February

South Coast Wildlands Project (SCWP). 2000. Missing Linkages: Restoring Connectivity to the California Landscape-Proceedings. San Diego Zoo, San Diego. November 21.

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407 W. IMPERIAL HWY, SUITE H, PMB 230, BREA, CALIFORNIA 92821

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

December 20, 2002

BOB HENDERSON
CHAIR
CITY OF WHITTIER

GLENN PARKER
VICE-CHAIR
PUBLIC MEMBER
ORANGE COUNTY

FRED KLEIN
CITY OF LA HABRA HEIGHTS

DEBORAH O'CONNOR
CITY OF DIAMOND BAR

BEV PERRY
CITY OF BREA

STEVE FELD
PUBLIC MEMBER
LOS ANGELES COUNTY

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GARY WATTS
CALIFORNIA STATE PARKS

JAMES HARTL
EX OFFICIO MEMBER
LOS ANGELES COUNTY
BOARD OF SUPERVISORS

County of Los Angeles
Department of Regional Planning
Attn: Mark Herwick,
320 West Temple Street
Los Angeles, California 90012

Comments on Notice of Preparation for Comprehensive Update and Amendment to the Los Angeles County General Plan

Dear Mr. Herwick:

The Wildlife Corridor Conservation Authority (WCCA) has reviewed the Notice of Preparation (NOP) and Initial Study (IS) for Comprehensive Update and Amendment to the Los Angeles County General Plan (Project No. 02-305). In letters dated April 30, 2001 and May 2, 2001 (enclosed), WCCA commented on the November 2000 Los Angeles County Significant Ecological Areas Update Study (PCR Services Corporation, *et al.* 2000a, 2000b, 2000c), "SEA Update Study." WCCA requests you consider incorporating into the General Plan WCCA's comments provided in these previous letters.

As stated in these previous letters, WCCA commends the County and its consultants on the excellent work done for the update of the Significant Ecological Areas (SEAs). Specifically WCCA complements the County's and consultants' efforts to propose more inclusive and biologically sound boundaries to ensure sustainability of the SEAs. This is evident in the proposed Puente Hills SEA as shown on Figure 4 of the NOP/IS, Existing and Proposed Significant Ecological Areas.

The scale of Figure 4 does not enable us to definitively determine whether all of WCCA's recommendations for inclusion in the Puente Hills SEA have been incorporated. It does appear that some areas that WCCA recommended for inclusion into the Puente Hills SEA were not included, according to Figure 4 of this NOP/IS. Specifically, WCCA recommends that two areas located east of Harbor Boulevard be included in the Puente Hills SEA (see Areas 5 and 6 described in WCCA's April 30, 2001 letter). We look forward to reviewing more detailed maps of the Puente Hills SEA in the Environmental Impact Report for the General Plan Update and Amendment. Area 5 forms an entrance to a small canyon which is a critical wildlife link and the area is core habitat of the western Puente Hills. Area 6 is a buffer for a canyon

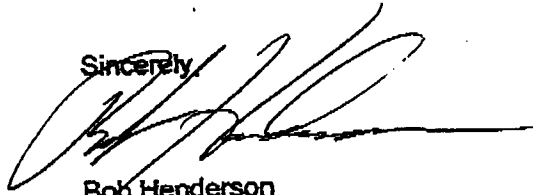
Mark Herwick
LA County NOP for General Plan Update and Amendment
December 20, 2002
Page 2

which forms a critical wildlife link south of Shea Homes, across Harbor Boulevard. Area 6 may also support the coastal California gnatcatcher, listed as threatened by the U.S. Fish and Wildlife Service.

WCCA also strongly supports the general recommendations for implementation and land use practices for SEAs, as well as the specific recommendations for management practices for the proposed Puente Hills SEA in the SEA Update study, with modifications based on WCCA's May 2, 2001 letter on the SEA Update Study.

Thank you for the opportunity to comment. Please contact Judi Tamasi of our staff at (310) 589-3230 ext. 121 if you have any questions.

Sincerely,



Bob Henderson
Chair

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000a. *Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area*. Prepared for: Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. *Executive Summary of the Proposed Los Angeles County Significant Ecological Areas*. Prepared for: Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000c. *Los Angeles County Significant Ecological Areas Update Study 2000 Background Report*. Prepared for: Los Angeles County Department of Regional Planning. November.

WILDLIFE CORRIDOR CONSERVATION AUTHORITY

407 W. IMPERIAL HWY, SUITE H, PMB #230, BREA, CALIFORNIA 92821

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

May 2, 2001

BEV PERRY
CHAIR
CITY OF BREA

GLENN PARKER
VICE-CHAIR
PUBLIC MEMBER
ORANGE COUNTY

BOB HENDERSON
CITY OF WHITTIER

FRED KLEIN
CITY OF LA HABRA HEIGHTS

DEBORAH O'CONNOR
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STEVE FELD
PUBLIC MEMBER
LOS ANGELES COUNTY

ELIZABETH CHEADLE
SANTA MONICA MOUNTAINS
CONSERVANCY

GARY WATTS
CALIFORNIA STATE PARKS

ROBIN MALONEY-RAMES
EX OFFICIO MEMBER
CALIFORNIA DEPARTMENT
OF FISH AND GAME

JAMES HARTL
EX OFFICIO MEMBER
LOS ANGELES COUNTY
BOARD OF SUPERVISORS

George Malone, Section Head
Los Angeles County
Department of Regional Planning
General Plan Development Section
320 West Temple Street, 13th Floor
Los Angeles, California 90012

Supplemental Comments on Los Angeles County Significant Ecological Areas Update Study

Dear Mr. Malone:

The Wildlife Corridor Conservation Authority (WCCA) offers the following comments on the Significant Ecological Areas Update Study documents prepared by the consultant team for the County of Los Angeles (County) (PCR Services Corporation *et al.* 2000a, 2000b, 2000c). This letter supplements our comments regarding the boundaries of the Puente Hills Significant Ecological Area (SEA) submitted in our April 30, 2001 letter. To reiterate from our previous letter, we commend the County and their consultants on the excellent work done for the SEA Update Study, including the consultants' efforts to propose more inclusive and biologically sound boundaries. We provide the following additional comments pertaining to the County's procedures for identifying and protecting SEAs within the County.

Identification and Management of Core Areas Within SEAs

Whether before or after the County adopts new SEA boundaries, WCCA recommends that SEAs be further evaluated to identify core areas that are absolutely essential for protecting critical plant and animal resources. In addition, corridors between core habitats must also be identified. The width of these movement areas must be based on actual monitoring of wildlife movement and on the biological needs of the target species they are intended to support. At the very least, these movement areas should be at least 600 feet wide. Critical riparian areas should include buffers at least 300 feet wide on each side from the stream edge of California Department of Fish and Game streambed jurisdiction. WCCA is pleased to assist in establishment of core areas for the Puente Hills SEA.

Future developments should not be permitted within core SEAs, because of the extreme importance of these areas to species using them. If the County chooses not to define core habitat zones, then future development should not be permitted in any area of the SEA unless certain conditions are met. Development should only be allowed in the SEA if the potential developer has fully mapped the biological resources and wildlife movement corridors within and adjacent to the proposed area of development and it has been demonstrated that the sensitive biological resources and wildlife movement corridors will be protected.

Management Within SEAs

WCCA concurs with limiting development to no more than 20 percent of the SEA, as proposed in the Background Report (PCR Services Corporation *et al.* 2000c; p. 29). (The SEA boundaries should be defined by those boundaries proposed in the Update Study documents and expanded based on comments received during the public review process). This 20 percent should include existing developed parcels, and should include fuel modification zones required for developments.

We strongly support the general recommendations for implementation and land use management practices, beginning on page 26 of the background report, and the specific recommendations for the proposed Puente Hills SEA on page ES-76 of the Executive Summary (PCR Services Corporation *et al.* 2000b, 2000c), with the modifications proposed in this letter. Reservoirs should be identified as an incompatible use with respect to SEA resources and should be excluded from SEAs.

Mitigation developments approved in SEAs or other sensitive areas should include setting aside or purchasing lands within the SEAs, prioritizing those lands within the core SEA areas.

SEATAC's Role in Protection of SEAs

We recommend greater involvement by the Significant Ecological Areas Technical Advisory Committee (SEATAC) in zoning matters that affect SEAs. More specifically, SEATAC recommendations need to be highlighted in County staff reports. In addition, SEATAC recommendations must hold more weight in the Environmental Impact Report alternatives process.

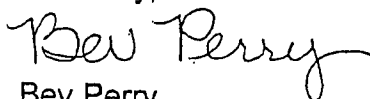
Application of Criteria to SEAs

In reviewing the consultant's recommendations, WCCA believes that criterion 1, pertaining to habitat of "core populations," has been applied inappropriately. The Puente-Chino Hills supports breeding populations of federally listed species such as the coastal California

gnatcatcher (*Polioptila californica californica*) near the northwest edge of its range (Cooper 2000) and in the background report, a core population is defined as "a known and/or a viable population" (PCR Services Corporation *et al.* 2000c; p. 11). However, in the SEA Update Study, it was concluded that this criterion was not met. We believe that, given the rate of extinctions occurring among the indigenous species of southern California, no area containing breeding populations of such species should be excluded from the SEA program.

Thank you for allowing us to submit these supplemental comments after the identified deadline in order to accommodate the schedule of our Governing Board. WCCA welcomes the opportunity to work with the County in our mutual efforts to preserve the Puente Hills SEA. Please direct any questions and correspondence to Judi Tamasi of our staff at (310) 589-3200 ext. 121.

Sincerely,



Bev Perry
Chairperson

Literature cited

Cooper, D.S. 2000. Breeding landbirds of a highly threatened open space: the Puente-Chino Hills, California. In: *Western Birds* 31:213-234.

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407 W. IMPERIAL HWY, SUITE H, PMB #230, BREA, CALIFORNIA 92821

TELEPHONE: (310) 589-3230

FAX: (310) 589-2408

April 30, 2001

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CITY OF BREA

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George Malone
Section Head
Los Angeles County
Department of Regional Planning
General Plan Development Section
320 West Temple Street, 13th Floor
Los Angeles, California 90012

Comments on Los Angeles County Significant Ecological Areas Update Study, Proposed Puente Hills SEA

Dear Mr. Malone:

The Wildlife Corridor Conservation Authority (WCCA) has reviewed the Significant Ecological Areas Update Study documents prepared by the consultant team for the County of Los Angeles (County) (PCR Services Corporation *et al.* 2000b, 2000c), including the Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area (PCR Services Corporation *et al.* 2000a). The following comments were adopted by our Governing Board at our March 7, 2001, meeting. Please note that as we previously indicated in an email to you, we will submit additional comments on the SEA Update Study after WCCA's next Governing Board meeting of May 2, 2001.

For the Significant Ecological Areas (SEA) program, the County of Los Angeles (County) is revising existing SEA boundaries and regulatory policies as part to the General Plan update effort. The objective of the SEA program is to preserve biotic diversity in the County, and this objective has been expanded to include the future sustainability of this diversity through the application of more current practices in conservation biology, primarily by consolidation into larger interconnected SEAs (PCR Services Corporation *et al.* 2000b). The proposed acreage of the consolidated areas has been substantially increased compared to the SEAs previously designated in the 1980 County General Plan.

WCCA commends the County and its consultants on the excellent work done for the Significant Ecological Areas Update Study and specifically on the consultants' efforts to propose more inclusive and biologically sound

boundaries to ensure sustainability of the SEAs. This is evident in the proposed Puente Hills SEA.

WCCA offers the following recommendations to fine-tune the proposed Puente Hills SEA. Our staff is available to work with the County and other interested parties to reach a resolution of these issues. The majority of these suggestions reflect the boundaries we proposed in our May 1, 2000, SEA nomination submittal. The following numbered comments correspond to the enclosed maps. These maps also depict portions of our original recommended boundaries. At times, it was difficult to verify the specific proposed SEA boundaries based on the scale of the mapping in the SEA reports. As such, we did our best to estimate the boundaries proposed in the SEA Update Study.

Wildlife Corridor Conservation Authority's Recommendations for Modifications to Proposed Puente Hills Significant Ecological Area		
Area Number (see enclosed maps)	Location/ Description	Recommendation and Rationale
1	Puente Hills Landfill. South of 60 Freeway, east of 605 Freeway	Include. Good habitat is present on the east and north side of property. Links to San Jose Creek and Whittier Narrows. Landfill will be closed and habitat value of landfill area will be determined in final closure plan.
2	Savage Canyon/ Worsham Canyon	Include. Good habitat value in Savage Canyon and lower Worsham Canyon.
3	North end of Mallas Property	Include. Land owned by Puente Hills Landfill Native Habitat Preservation Authority. Good habitat value.

4	Water tank area west of Powder Canyon and north of Reposado Drive	This area is a restricted corridor area. Corridor width must be maximized here. It is difficult to verify the exact location of the proposed SEA in this area. If an area around the water tank that was proposed by WCCA is not included in the proposed SEA, WCCA recommends including it.
5	Land southeast of Shea Homes	Include. This area forms the entrance to a small canyon which is a critical wildlife link and the area is core habitat of the western Puente Hills.
6	Oil field east of Harbor Boulevard	Include. This area is a buffer for a canyon which forms a critical wildlife link south of Shea Homes across Harbor Boulevard.
7	57 Freeway Corridor	SEA could exclude freeway but should include Brea Creek. The SEA should include land up to and excluding California Department of Transportation right of way to assure protection for Brea Creek. However, this should not include already deeded or entitled land within the City of Diamond Bar.
8	Southern boundary of Diamond Bar	It appears developed areas of Diamond Bar may have been included in the proposed revision (near 57 Freeway). These should be excluded and this boundary immediately adjacent to Diamond Bar should conform to boundary of existing SEA 15.
9 (Not shown on enclosed maps)	Part of City of Diamond Bar	The northern boundary of the proposed Puente Hills SEA east of the 57 Freeway and west of Los Angeles/San Bernardino County lines near the incorporated City of Diamond Bar should correspond to the existing SEA in this area. It is not necessary to include already deeded restricted open space and developed lands in Diamond Bar in the proposed SEA.

10 (Not shown on enclosed maps)	San Jose Creek and San Gabriel River	The soft-bottomed portions of San Jose Creek and the San Gabriel River, which provide wildlife habitat and potential movement corridors from the Puente Hills to Whittier Narrows and the San Gabriel Mountains, should be included. The specific area of San Jose Creek should include the soft bottom portions from its confluence with the San Gabriel River to approximately 8,000 feet east of the confluence.
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In summary, we commend and support the County and their consultants on their progress on the SEA Update Study, and particularly on the proposed Puente Hills SEA. We look forward to working with you to incorporate the above-mentioned suggestions. We will forward additional comments on the SEA Update Study after our May 2, 2001, Governing Board meeting. Please direct any questions and correspondence to Judi Tamasi of our staff at (310) 589-3200 ext. 121.

Sincerely,



Bev Perry
Chairperson

Enclosures (4)

Literature cited

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000a. *Biological Resources Assessment of the Proposed Puente Hills Significant Ecological Area*. Prepared for: Los Angeles County Department of Regional Planning November.

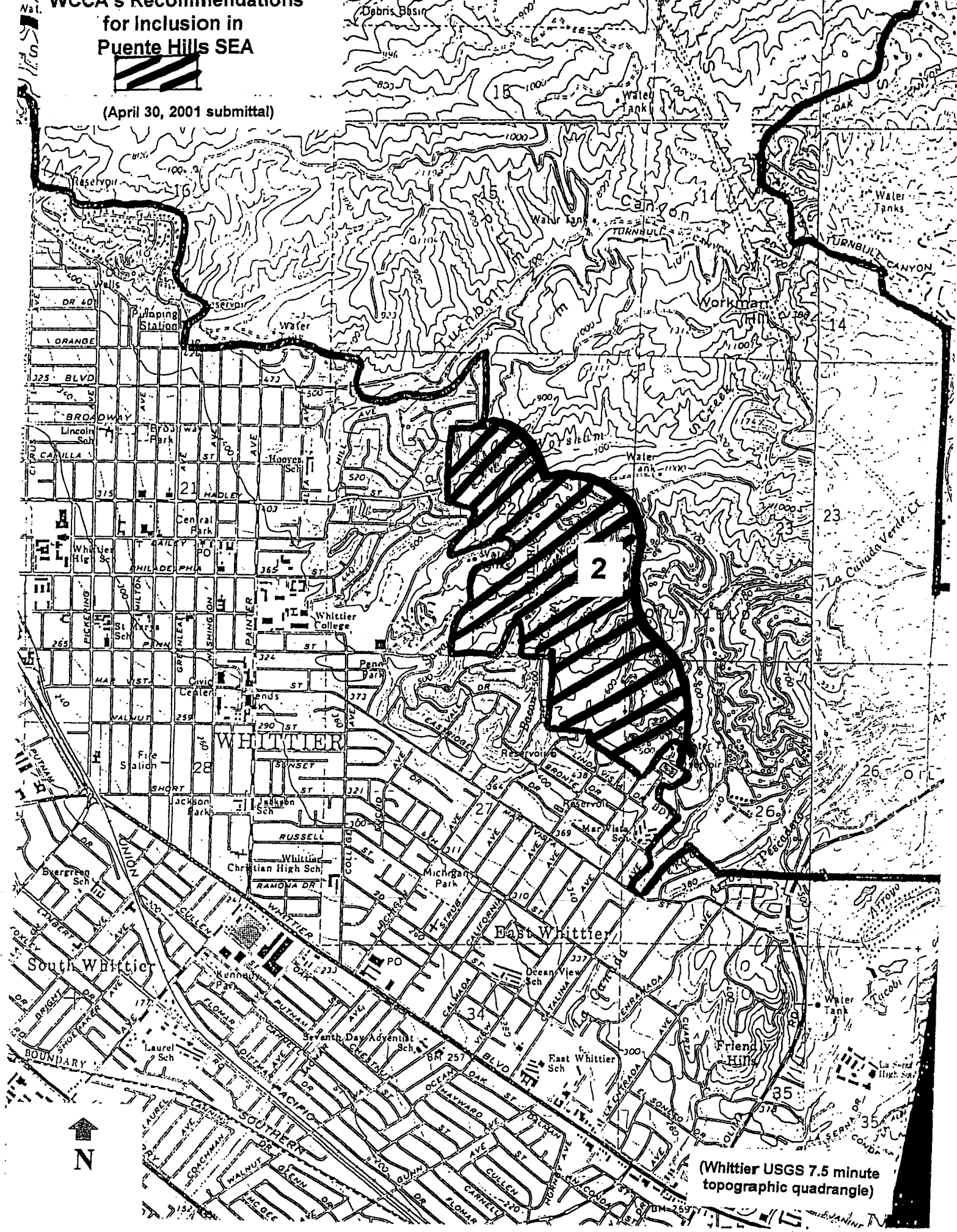
PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. *Executive Summary of the Proposed Los Angeles County Significant Ecological Areas*. Prepared for: Los Angeles County Department of Regional Planning. November.

PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000c. *Los Angeles County Significant Ecological Areas Update Study 2000 Background Report*. Prepared for: Los Angeles County Department of Regional Planning. November.

WCCA's recommendations
for inclusion in
Puente Hills SEA



(April 30, 2001 submittal)

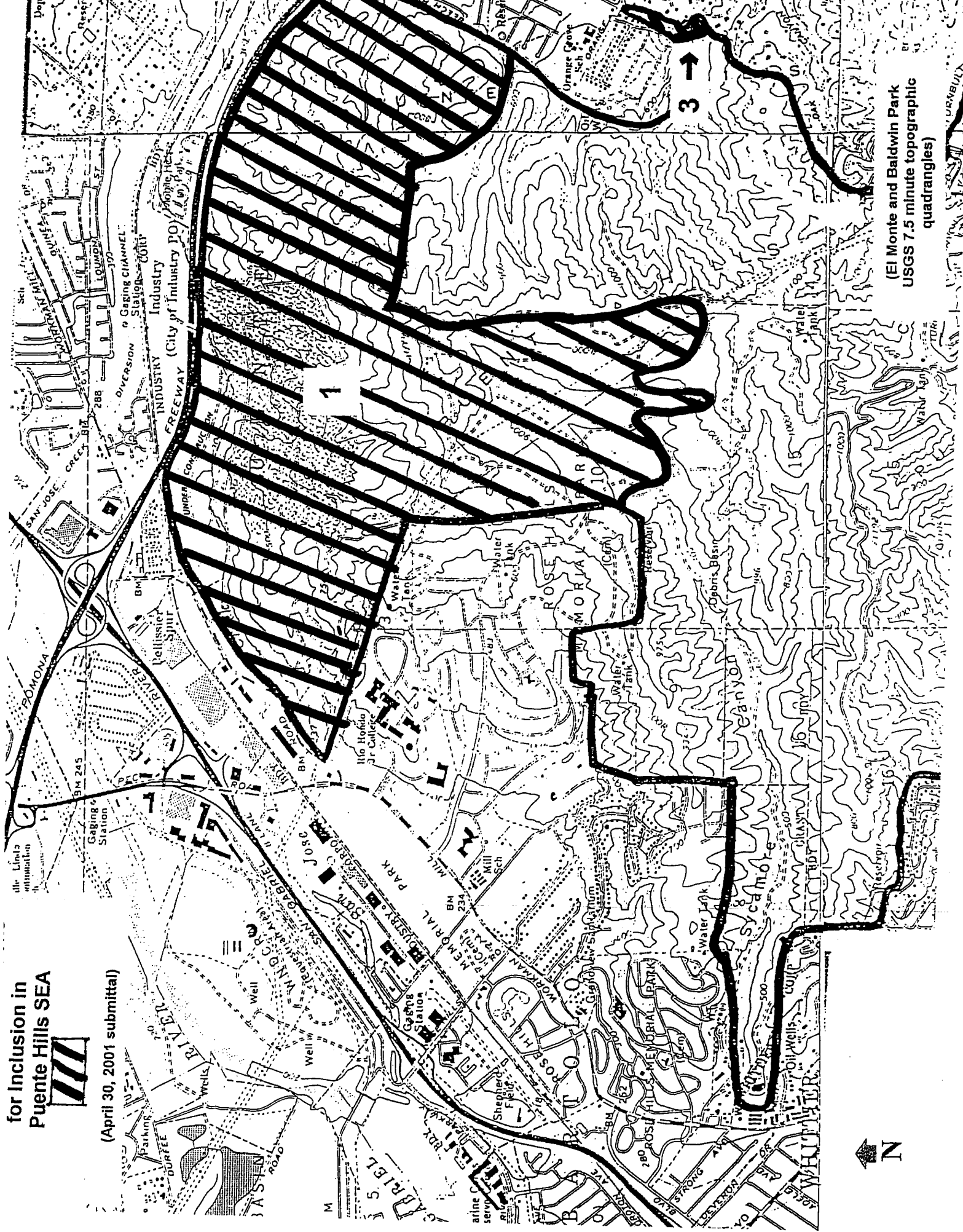


(Whittier USGS 7.5 minute
topographic quadrangle)

for Inclusion in
Puente Hills SEA



(April 30, 2001 submittal)

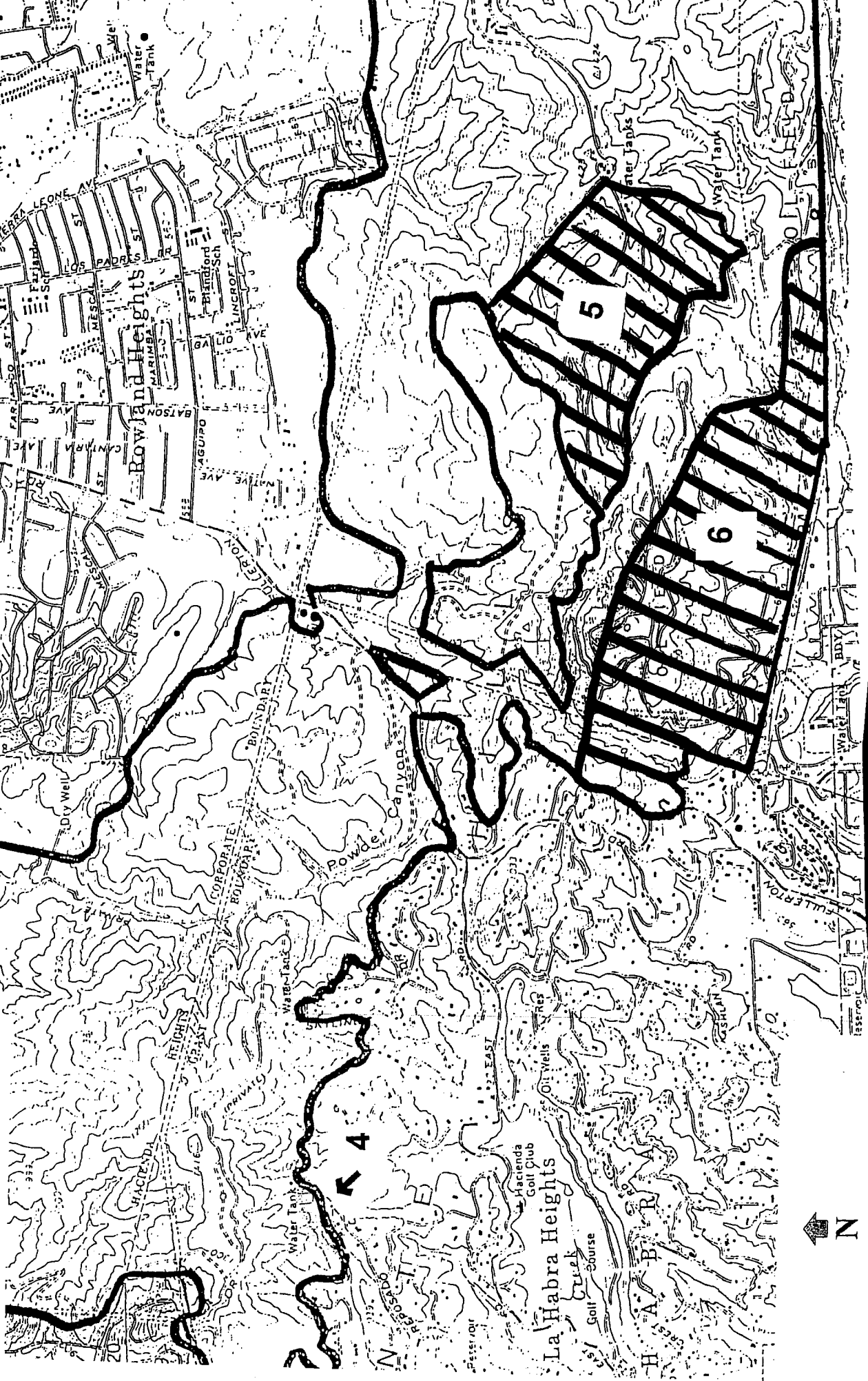


(El Monte and Baldwin Park
USGS 7.5 minute topographic
quadrangles)

for Inclusion in
Puente Hills SEA



(April 30, 2001 submittal)



(La Habra USGS 7.5 minute
topographic quadrangle)

Puente Hills SEA

(April 30, 2001 submittal)

117°5
34°00'

